To date, the marginalization of Assistive Technology (AT) in assessment and instruction has created consistent low performance. The result is that the academic achievement of students with disabilities has been seriously suppressed. While tests have built in universal supports, students with disabilities are still facing significant barriers to use of AT. Every Student Succeeds Act (ESSA) is now in effect and significant changes need to be made prior to testing for the 2017-2018 school year.

To address this serious issue ATIA believes the following must occur:

1. **Ensure test security does not take priority over access to AT and accommodations.**

   Security does not take away a student’s right to accommodations. Secured browsers by nature block AT. Solutions to date have created undue burden for students and districts. Lack of access to AT and requirements for multiple devices.

   Chromebooks are current the top platform in K-12 at this time per (Edweek http://bit.ly/2ppnvEg May 2017) Kiosk mode (secured browser mode) will not permit ANY AT at this time. This means is that the majority of students are denied access to their AT or are forced to use different tools/technology for the assessment. Accommodation manuals clearly state that students should have familiarity with the tools and platforms prior to the test. These limitations in AT interoperability put districts in situations where they cannot meet all requirements and overall students’ performance is being compromised.

   **Examples of security taking away a student’s right to accommodations:**
   - QIAT List Serve posting October 5, 2017: “I have 37 students who have speech to text for SBAC testing. Students have Chromebooks and use extensions and accessibility features, however these are not available when running in kiosk mode for state testing. Last year they were given dragon dictation, this option did not work either…. ” Speech to Text: Secured browsers are forcing students to only 2 options: a) Apple’s built in speech to text b) Dragon Dictate which requires hours of additional time to train their voice.
   - Word Prediction: “The student uses an external word prediction device that provides a bank of frequently or recently-used words on-screen after the student enters the first few letters of a word.” After testing requirements include transcription by test administration, collection and destruction of content created during assessment.

2. **Ensure AT is interoperable, as required by ESSA.**

   Do not burden or blame schools or AT companies when AT is not compatible. Prioritize interoperability over built-in accessibility. Plan for interoperability must include security issues. Do not limit interoperability to a single technology. Do not limit AT to avoid interoperability with assessments. Work with ATIA to ensure interoperability. Refer to ATIA’s other position paper of recommendations signed by many Special Education Organizations. Require interoperability beyond standardized assessments. ESSA allows states to use multiple measures in assessing students, therefore states must to ensure students have equal access to AT in all assessment settings.

   **Examples of lack of interoperability:**
   - “Refer to the list of allowable assistive technology here.”
   - “The online system is not interoperable with assistive devices and/or software.”

**Interoperability is the ability of a system or a product to work with other systems or products without special effort on the part of the user.**

The Every Student Success Act requires:

“A State’s academic assessment system must provide, for each student with a disability … the appropriate accommodations, such as interoperability with, and ability to use, assistive technology devices consistent with nationally recognized accessibility standards, that are necessary to measure the academic achievement of the student…”

*Source: 34 CFR §200.6 (b)*
3. Remove policies, training, and requirements that put limits on AT usage.

Assistive Technology should be encouraged instead of restricted. Policies and training that require cut scores, place limits on the percentage of students with disabilities allowed to use accommodations, or states that reserve AT for only students with the most significant disabilities.

Examples of policies that limit AT:
- “Note that this accommodation is appropriate for a very small number of students (estimated to be approximately 1-2% of students with disabilities participating in a general assessment)”
- “A relatively small number of students will require additional accessibility features…”
- The human scribe accommodation for constructed response items on the xxx ELA assessment is available to a limited number of students with a neurological or orthopedic impairment which severely limits or prevents the student’s motor process of writing. A fine motor or neurological assessment has been given within one academic year.

4. Remove limits on types of tools or features.

Assessments are meant to measures of College & Career Readiness. For students with disabilities, technology will be key to independence and success in college and career. Do not limit AT or features of AT unless there is clear evidence that it violates construct. Statements are often made without evidence that it violates construct. Without clear evidence, student performance may be unnecessarily suppressed. Conversely, AT should be encouraged and limits of AT use should be minimized with only clear evidence of a construct violation.

Examples of policies that limit features/tools:
- “There are some accommodations that may be used for instruction or for formative assessments but are not allowed for the PARCC summative assessment because they impact the validity of the assessment results – for example, allowing a student to use a thesaurus or access the internet during a PARCC assessment. There may be consequences (e.g., excluding a student’s test score) for the use of non-allowable” accommodations during PARCC assessments. NOTE: SBAC allows an embedded thesaurus.

“An ingrained prejudice against performing activities in ways that might be more efficient for disabled people but that are different from how nondisabled perform them.”

At the Federal level:
- Compliance for AT consideration
- Ensure ESSA plans comply with interoperability
- Ensure compliance with U.S. Department of Justice Testing Accommodations Guidance
  www.ada.gov/regs2014/testing_accommodations.html

At the District level:
- Identify Actions above that are needed from state officials
- Express concerns/burdens created by policies to state officials
- Increase access to AT on State assessments according to IEP’s
- Fully understand the guidelines for providing accommodations for students who use AT
- Monitor fidelity of implementation of AT
- Ensure students are provided AT for all areas of instruction including assessment

At the State level:
- Revise policies to align to above recommendations
- Assure interoperability AT in all of state assessments
- Develop widespread information and resources for local districts to understand accommodations and how to expand use of AT not limit it
- Revise Accommodations Manual and trainings
- Correct statements in trainings that elude to limits
- Create a vision of college and career readiness assuming use of AT and skills
- Compliance for AT consideration
- Interview districts/staff for undue burdens created by policy